

**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-88-E**

IN RE:)	
Dominion Energy South Carolina,)	
Incorporated's 2021 Avoided Cost)	CONSENT MOTION FOR
Proceeding Pursuant to S.C. Code Ann.)	EXTENSION OF TIME
Section 58-41-20(A))	<u>AND</u>
)	MOTION TO CONTINUE HEARING

INTRODUCTION

NOW COMES the Carolinas Clean Energy Business Association (“CCEBA”) pursuant to Commission Regulation, R.103-829 and other applicable Commission Rules and Regulations, and with the consent of Dominion Energy South Carolina, Inc. (“DESC”) and the other Intervenor listed below, seek approval from this Commission by a Motion for Extension of Time, and a Motion to Continue the Hearing, now scheduled in this matter, with the consent of the listed Intervenor.

STATUS

CCEBA filed its Motion for Extension of Time and Other Relief on July 7, 2021. Thereafter on, July 12, 2021, Chief Hearing Officer David Butler issued Directive Order No. 2021-96-H, holding the filing dates in this matter in abeyance, until July 19, 2021.

CONSENT MOTION FOR EXTENSION OF TIME

The parties have resolved the issues which gave rise to CCEBA’s July 7, 2021 Motion described above. As a result of these conversations DESC has agreed to respond to the bulk of outstanding discovery served by the Intervenor¹ by July 20, 2021 and to consent to the below requested extensions of time.

Johnson Development Associates and the South Carolina Department of Consumer Affairs do not oppose CCEBA’s Motion for Extension of Time. Counsel for the South Carolina Office of Regulatory Staff (“ORS”) received a copy of this Motion.

¹ Discovery recently served during the current week of July 12, 2021 is excepted other than SCCCL and SACE’s Third Data Request.

WHEREFORE, CCEBA, with the consent of DESC and additional Intervenors, South Carolina Coastal Conservation League, (“SCCCL”) the Southern Alliance for Clean Energy (“SACE”) and Pine Gate Renewables, LLC, hereby move the Commission to order the following:

- (1) That the deadline by which Intervenors and ORS must file Direct Testimony is extended until July 27, 2021.
- (2) That the deadline by which DESC must file Rebuttal Testimony is extended until August 10, 2021.
- (3) That, in the event CCEBA’s further motion to extend the hearing date set forth below is denied, that the deadline by which Intervenors and ORS must file Surrebuttal Testimony is extended until August 13, 2021.

MOTION TO CONTINUE HEARING

In addition to the above consented relief, CCEBA also shows the Commission that the schedule consented to by the parties will leave Intervenors only three days in which to review DESC’s Rebuttal testimony and to prepare Surrebuttal testimony before the filing deadline of August 13, 2021. A two-week continuance in the hearing date until September 1, 2021 would allow Surrebuttal Testimony to be filed August 24, 2021 and give Intervenors and ORS a reasonable amount of time to review opposing testimony and file Surrebuttal testimony, if desired, prior to the hearing.

WHEREFORE, CCEBA with the consent of the additional Intervenors, South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy and Pine Gate Renewables, LLC, additionally moves the Court to continue the hearing date in this matter until September 1, 2021, and to extend the deadline by which Intervenors and ORS must file Surrebuttal Testimony until August 24, 2021.

MOREOVER, should the Commission grant the requested continuance but, due to its schedule, set the new hearing date to convene after the Labor Day holiday of September 6, 2021, then and only in that event, the Intervenors and DESC agree that DESC may have until August

17, 2021 to file its Rebuttal testimony and the Intervenor and ORS would in that event have until September 1, 2021 to file any Surrebuttal testimony.

Johnson Development Associates, the South Carolina Department of Consumer Affairs and DESC do not oppose CCEBA's Motion to Continue Hearing. Counsel for ORS received a copy of this Motion.

Both Motions are respectfully submitted, this 16th day of July, 2021.

Respectfully Submitted,

/s/Richard L. Whitt

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*As Counsel for Intervenor, Carolinas Clean Energy
Business Association.*

July 16, 2021